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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IROQUOIS GAS TRANSMISSION SYSTEM L.P.,)
Plaintiff,) 05 Civ. 2149 (JSR)
- v. -)
ASSOCIATED ELECTRIC & GAS INSURANCE)
SERVICES LTD., Hamilton, Bermuda (AEGIS), and)
CERTAIN UNDERWRITERS AT LLOYD'S; AON)
RISK SERVICES OF TEXAS, INC.; and)
AMERICAN HOME ASSURANCE CO.,)
Defendants.)

STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)

Charles E. Schmidt, affirms under penalties of perjury as follows:

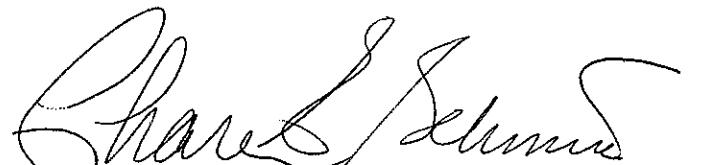
1. I am a member of the firm of Kennedy Lillis Schmidt & English, attorneys for defendant AMERICAN HOME ASSURANCE COMPANY ("AMERICAN HOME") herein. I make this affirmation in response to the cross-motion of IROQUOIS GAS TRANSMISSION SYSTEM L.P. ("IROQUOIS") for summary judgment against LLOYD'S herein.

2. I have had the opportunity to review and discuss with him the affidavit of John P. Vayda filed on behalf of co-defendant ASSOCIATED ELECTRIC & GAS INSURANCE SERVICES LTD. ("AEGIS") in response to the cross-motion of IROQUOIS herein.

3. For the reasons expressed therein, AMERICAN HOME joins AEGIS in requesting that if the Court determines that the subject matter of that cross-motion is not subject to the Court's stay, the Court deny IROQUOIS' cross-motion for summary judgment.

I affirm under penalties of perjury that the foregoing is true and correct. Executed at New York, New York, this 23rd day of September, 2005.

Dated: New York, New York
September 23, 2005



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